

# EXHIBIT

## AA

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<b>In re Terrorist Attacks on September 11, 2001</b>	<b>03-md-1570 (GBD)(SN)</b> <b>ECF Case</b>
<b>This document relates to:</b>  <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	<b>15-cv-9903 (GBD) (SN)</b> <b>ECF Case</b>

**DECLARATION OF ELAINE HELMS**

**I, ELAINE HELMS**, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached herein as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center Towers occurred. At the time of these horrific attacks, I was a Security Officer and I worked for Unique Security Guard Services. When the first passenger jet struck the North Tower, I was checking identifications and issuing badges for visitors at my duty station in the lobby of the Visitors Center of the South Tower.

4. After the passenger jet struck the North Tower, I heard an elevator fall and then I watched as building debris began to fall around the area outside of the South Tower. Everyone

around me began to panic and run to safety. I could not exit the South Tower through the lobby doors as building debris had covered the exit. But through the lobby windows of the South Tower, I could see that the North Tower of the World Trade Center was pitch black with smoke and the building was on fire. I saw horrible images of people who were on fire inside and outside of the North Tower, as well as people jumping to their deaths from the concourse between the North and South Towers. I also saw body parts surrounding the area of the North Tower. These images caused me to suffer indescribable emotional trauma that continues to this day.

5. At this point, I made my way around to the opposite side of the South Tower in order to escape. As I exited the South Tower, I fell and I was trampled by my co-workers and other people as they also rushed through the exit. Upon falling to the ground, I suffered significant injuries to my back, neck, left hip, left wrist, and left shoulder. Despite my painful injuries, I stumbled to my feet and exited the area. As I exited to the area outside of the South Tower, the second passenger jet struck the South Tower. I thought to myself, "Oh my god...this is real!!" People all around me were panicking and hysterical.

6. Despite the above chaos, I waded through the building debris, dust, and chemicals, and I made my way to the sea port area along with others who were trying to escape these horrific terrorist attacks. I then watched as the South Tower collapsed and a plume of smoke and debris filled the sky around Ground Zero.

7. I feared that the terrorists would also try to bomb the Brooklyn Bridge, so I chose to walk to a ferry that took me to Staten Island. Emergency personnel then transported me to Meadowlands Hospital where I received treatment for my numerous injuries.

8. As a result of these terrorist attacks, I suffered the following specific physical injuries on September 11, 2001: spinal disc herniation at the L5-S1 level; derangement of my lumbosacral spine; bulging discs at the C5-6 and C6-7 levels; a left hip sprain; a left wrist sprain;

left shoulder sprain; left ankle sprain; severe headaches; severe respiratory issues due to large amounts of dust and debris that I inhaled on 9/11, which resulted in my suffering from a collapsed lung on three occasions, ultimately ending in a lobectomy in June 2004.


9. I sought medical attention on the day of the 9/11 attacks as described above. Further, I have continued to receive regular medical attention on a monthly basis for my injuries caused by these terrorist attacks. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatments that I received for my physical and emotional injuries following the September 11, 2001 terrorist attacks.

10. I further suffered, and continue to suffer, severe emotional distress as a result of these terrorist attacks. I suffered and continue to suffer from PTSD, anxiety, depression, and panic attacks due to these traumatic events. I received and continue to receive professional treatment for the above emotional conditions caused by my experiences on 9/11. Due to the severity of my emotional trauma and my resulting psychiatric conditions caused by the events of 9/11, my doctors, including Dr. Fern Axelrod and Dr. Howard A. Layman, determined that I am totally disabled and unable to perform any jobs available in the labor force.

11. I previously pursued a claim through the September 11th Victim Compensation Fund (VCF Number Unknown) specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 26th day of December 2019.

  
Declarant, Elaine Helm

**EXHIBITS  
FILED  
UNDER SEAL  
(ECF No.  
5716)**